

**AECL**  
Atomic Energy  
of Canada Limited

**EACL**  
Énergie atomique  
du Canada limitée

**Patrick M. Murphy**

Senior Legal Counsel  
Conseiller juridique principal

ORIGINAL



SDMS DocID

2125798

May 23, 2008

**Via Fax & by Mail**

U.S. Environmental Protection Agency, Region 3  
1650 Arch Street  
Philadelphia, PA  
19103-2029

**Attention:** Mr. Harry R. Steinmetz

**Dear Sir:**

**Re: Section 104 (e) CERCLA Request for Information  
-Safety Light Corporation Site, Bloomsburg, PA**

This letter is in response to the letter from Laura B. Janson, USEPA Region 3, received April 29, 2008, with respect to the request for information relating to the alleged release, or the threat of release of hazardous substances, pollutants or containments impacting the subject site.

With respect to your request for information, Atomic Energy of Canada Limited ("AECL") hereby reserves its rights as a Federal Crown Corporation, (with its sole shareholder the Government of Canada as represented by the Ministry of Natural Resources) that it is immune as a sovereign state from any claim or alleged claim brought by an agency of the U.S. Government. Accordingly, AECL reserves the right to challenge the jurisdiction of USEPA to enforce CERCLA on a Canadian Crown corporation where there is little, if any, connection with the site or for that matter with the State of Pennsylvania. In addition, AECL reserves all of its other rights and defences in respect of the Section 104 (e) request for information.

Following the receipt of your letter, AECL did undertake a diligent search of its records. On the basis of our search, there is no documentation connecting AECL to the Safety Light Corporation Site in Bloomsburg, PA.

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Harry R. Steinmetz, U.S. Environmental Protection Agency, Region 3

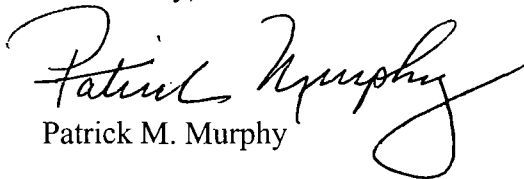
May 23, 2008

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*away sent  
PM.*

AECL denies that it is in ~~way~~ responsible or liable for the presence of radiological contamination found within on-site soils and in groundwater at the subject site.

Yours truly,

  
Patrick M. Murphy



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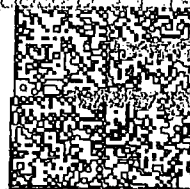
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Attention: Mr. Harry R. Steinmetz

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